

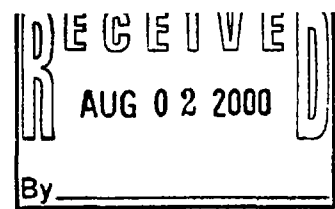
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Senator Martin Connor
Minority Leader

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July 27, 2000



Re: Proposed Rule 15 CFR Part 101
Docket No.: 000609172-0172-01
Comment in support.

Mr. John H. Thompson
Associate Director for the Decennial Census
Bureau of the Census
Suitland Federal Center
Suitland and Silver Hill Roads
Building 2 - Room 3586
Suitland MD 20233

Dear Mr. Thompson:

As a legislative leader who shares the responsibility for congressional and legislative redistricting, and as one of the statutory recipients of the PL 94-171 data, I wish to express my strong support for the proposed rule 15 CFR Part 101.

The census data directly underlie major public policy decisions, notably redistricting and the allocation of many expenditures, and are essential to the evaluation of many other policies. There is a vitally important role for politics in all of these areas of policy-making. Politics is the means by which a free people govern themselves, and I am proud to have devoted my life to that activity. But there is no place for politics in determining the census counts.

If the political process is to be reasonable, open, and fair - and is not to be perceived as having been rigged in advance - the debate must rest on honest, objectively accurate numbers. That will be possible only if the census counts are determined on the sole basis of sound scientific method, by the professional judgment of nonpartisan, scientifically-trained civil servants. The proposed rule would establish an orderly procedure for determining, on scientific grounds alone, whether the accuracy of the census counts can be improved by the use of statistical sampling, and would ensure that accuracy is the only criterion for deciding whether to make such a correction.

It is time for the politicians to stop making decisions about mathematics. Let the statisticians produce the most accurate numbers, and then it will be the politicians' turn to debate the policy choices that may be made on the basis of those numbers.

In his July 2000 *Statement on the Feasibility of Using Statistical Methods to Improve the Accuracy of Census 2000* (p. 31), Dr. Prewitt briefly addresses the assertion, frequently made by opponents of statistical sampling, that a statistical correction would open the census to the suspicion of political manipulation. In the circumspect language that befits a scholar, he points out that there is no evidence that the Census Bureau has either the intention or the ability to manipulate the Accuracy and Coverage Evaluation Survey so as to produce a predetermined political outcome, that the scientific techniques to be used are neither secret nor mysterious, and that the process is subject to extensive external oversight by a multiplicity of agencies.

I would go further.

The notion that a statistical correction would *introduce* the suspicion of political manipulation into the census process is preposterous. It is impossible not to suspect that much of the opposition to any statistical correction arises from a wish to preserve the differential undercount of racial and ethnic minority groups (as well as renters and children generally), and with it the racial and class bias that is introduced into redistricting and every other government decision-making process that employs census data.

To say that a statistical correction might undermine public confidence in the accuracy and integrity of the census is to suggest that neither African-Americans, nor Asian-Americans, nor Hispanic Americans, nor American Indians, nor tenants, nor populations with large families and lots of children, nor their close neighbors, are part of that public whose confidence in the integrity of their government must be maintained. All of these groups have historically been undercounted to a far greater degree than the population as a whole; and all of their neighbors living in the same communities or jurisdictions suffer the consequences along with them, through a loss of political representation and public resources. The differential undercount was worse in 1990 than in 1980. And even with the best efforts of the Census Bureau – the improved address lists, the Local Update of Census Address program, the paid advertising, the apparent improvements in field operations – there is every reason to suppose, as the Census Bureau's professional staff tells us, that 'traditional census-taking methods' will again produce a large differential undercount in 2000.

If it proves feasible to increase the accuracy of the census through statistical sampling, if the differential undercount can be thereby reduced, if scientifically-trained nonpartisan civil servants reach a consensus that these goals can be achieved, and yet nothing is done, let no one imagine that the suspicion of political manipulation will not have been aroused.

The decision-making process to be established by the proposed rule offers the best hope for a census which all Americans can view with confidence and trust.

Yours truly,



Martin Connor
Minority Leader